

EXHIBIT

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<p style="text-align: right;">Page 1</p> <p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE WESTERN DISTRICT OF MISSOURI 3 ST. JOSEPH DIVISION 4 KAREN BACKUES KEIL,) 5 Plaintiff,) 6 vs.) Case No. 5:18-CV-06074-BP 7) 8 MHM SERVICES, INC.,) 9 et al.,) 10) 11 Defendants.)</p> <hr/> <p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE WESTERN DISTRICT OF MISSOURI 3 ST. JOSEPH DIVISION 4 JANE DOE,) 5 Plaintiff,) 6 vs.) Case No. 19-06161-CV-SJ-BP 7) 8 MHM SERVICES, INC.,) 9 et al.,) 10) 11 Defendants.)</p> <p>1 VIDEOCONFERENCE DEPOSITION OF TERI DEAN 2 Taken on behalf of the Defendants 3 April 23, 2021</p>	<p style="text-align: right;">Page 3</p> <p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE WESTERN DISTRICT OF MISSOURI 3 ST. JOSEPH DIVISION 4 KAREN BACKUES KEIL,) 5 Plaintiff,) 6 vs.) Case No. 5:18-CV-06074-BP 7) 8 MHM SERVICES, INC.,) 9 et al.,) 10) 11 Defendants.)</p> <hr/> <p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE WESTERN DISTRICT OF MISSOURI 3 ST. JOSEPH DIVISION 4 JANE DOE,) 5 Plaintiff,) 6 vs.) Case No. 19-06161-CV-SJ-BP 7) 8 MHM SERVICES, INC.,) 9 et al.,) 10) 11 Defendants.)</p> <p>1 VIDEOCONFERENCE DEPOSITION OF TERI DEAN, produced, 2 sworn, and examined on the 23rd day of April, 2021, 3 between the hours of eight o'clock in the forenoon 4 and six o'clock in the evening of that day, via 5 videoconference from Vandalia, Kansas, before ROBIN 6 PROUTY, RPR, a Certified Court Reporter within and 7 for the State of Missouri, in a certain cause now 8 pending in the United States District Court for the 9 Western District of Missouri, St. Joseph Division, 10 on behalf of the Defendants.</p>
<p style="text-align: right;">Page 2</p> <p>1 INDEX OF EXAMINATION 2 PAGE: 3 Examination by Mr. Taulbee 6 4 Examination by Ms. Wang 126 5 Examination by Mr. Buchheit 156 6 Examination by Ms. Wang 174 7 Examination by Ms. Snow 179 8 Examination by Mr. Taulbee 193 9 Examination by Ms. Wang 198 10 Examination by Ms. Snow 200 11 Examination by Ms. Wang 201</p> <p>12 INDEX OF EXHIBITS 13 EXHIBIT NO: MARKED: IDENTIFIED: 14 Exhibit 1 5 113 15 Exhibit 2 5 114 16 Exhibit 3 5 19 17 (Original exhibits attached electronically to original 18 transcript.)</p>	<p style="text-align: right;">Page 4</p> <p>1 A P P E A R A N C E S 2 For Plaintiff (via videoconference): 3 Ms. Jenifer Snow 4 LAW OFFICES OF JOAN M. SWARTZ 5 3348 Greenwood Boulevard 6 St. Louis, Missouri 63143 7 314.471.2032 8 jsnow@jmsllc.com 9 For the Defendants Edward Bearden, Todd Mustain 10 and Elijah Mosier (via videoconference): 11 Mr. Nicolas Taulbee 12 STATE OF MISSOURI ATTORNEY GENERAL'S OFFICE 13 Fletcher Daniels State Office Building 14 615 East 13th Street, Suite 401 15 Kansas City, Missouri 64106 16 816.889.5022 17 nicolas.taulbee@ago.mo.gov 18 For the Defendant Kevin Reed 19 (via videoconference): 20 Ms. Crystle Wang 21 STATE OF MISSOURI ATTORNEY GENERAL'S OFFICE 22 207 West High Street 23 Jefferson City, Missouri 65101 24 573.751.3321 25 cristal.wang@ago.mo.gov 26 For the Defendant Anne L. Precythe 27 (via videoconference): 28 Mr. Zach Buchheit 29 STATE OF MISSOURI ATTORNEY GENERAL'S OFFICE 30 207 West High Street 31 Jefferson City, Missouri 65101 32 573.751.3321 33 zach.buchheit@ago.mo.gov 34 Reported By: 35 Robin Prouty, RPR, CCR No. 868 36 Alaris Litigation Services 37 1608 Locust 38 Kansas City, Missouri 64108</p>

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<p>1 Q. How long were you on 6 House? 2 A. I don't know. Maybe six months. 3 Q. Then where did you go? 4 A. I went to 7 House. 5 Q. How long were you on 7 House? 6 A. A few years maybe. 7 Q. Then where did you go from there? 8 A. 5 House. 9 Q. How long were you on 5 House, do you 10 recall? 11 A. I did a few years on each house. 12 Q. Then where did you go from 5 House then? 13 A. 4 House. 14 Q. Did you do a few years on 4 House? 15 A. That's probably the least time I did, on 16 4 House. 17 Q. Okay. Then where did you go from there? 18 A. At one point, I went back to 6 House. 19 Q. Did you go somewhere after 6 House? 20 A. I also went to 4 House when I did a 21 treatment. 22 Q. When was that? 23 A. Maybe in 2013. I'm not -- 24 Q. Okay. 25 A. -- exactly sure of the date.</p>	<p>1 A. Three or less violations per year. 2 Q. Okay. We are here today because you filed 3 a lawsuit against Edward Bearden, Elijah Mosier, 4 Todd Mustain and Kevin Reed, as well as Director 5 Anne Precythe, but alleging that the individuals 6 sexually assaulted you; is that correct? 7 A. Yes. 8 Q. I guess – well, I guess, first, when was 9 the first time that you reported that Edward Bearden 10 sexually assaulted you? 11 A. In 2018. 12 Q. And do you remember who you reported that 13 to? 14 A. Leslie Carsey. 15 Q. Was that in July of 2018? 16 A. I'm not sure. I don't remember the month. 17 Q. Let me just try this because it will be a 18 good test. I'm going to show you what I've 19 marked – or I'm going to attempt to show you what 20 I've marked as Exhibit 3. Can you see a document on 21 your screen that says Offender Statement? 22 MS. SNOW: Can you zoom in on that, 23 Nick? Yeah, that's better. Thank you. 24 Q. (By Mr. Taulbee) Can you see that, 25 Ms. Dean?</p>
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<p>1 Q. Is that the only treatment you did while 2 you were at DOC? 3 A. Yes. 4 Q. Okay. That was like a 180-day treatment; 5 is that right? 6 A. Yes. 7 Q. Any other housing units you lived on other 8 than the ones you've told me about? 9 A. No. 10 Q. Okay. Did you request to move around to 11 these housing units, or did you just get moved? 12 A. I requested to move to 7 House. It was an 13 honor dorm there. 14 Q. Were you in the honor dorm the entire time 15 you were in 7 House? 16 A. No. I wasn't quite – I was moved – I was 17 on C wing which wasn't an honor wing. 18 Q. What does it mean to be in the honor dorm? 19 A. You can go in and out of each other's 20 rooms. You get to go eat first. You get more good 21 visits. You get to stay up later at night. 22 Q. What do you have to do to get placed in the 23 honor dorm? 24 A. You have to be three or less violations. 25 Q. Say that again?</p>	<p>1 A. Yes. 2 Q. And do you recognize this? 3 A. Yes. 4 Q. And this is – well, this is your 5 handwriting in the body of this statement; is that 6 right? 7 A. Yes. 8 Q. And this is dated July 20th, 2018 in the 9 right-hand corner there; is that right? 10 A. Yes. 11 Q. Did you give this written statement as a 12 part of a – a verbal interview or an oral interview 13 that you also gave to Ms. Carsey? 14 A. Yes. 15 Q. And these are your words. You wrote these. 16 Ms. Carsey didn't dictate them to you or anything 17 like that? 18 A. That's correct. 19 Q. Was when you gave that written statement 20 accompanied by your interview the first time you had 21 reported to DOC allegations against Mr. Bearden? 22 A. Yes. 23 Q. For Elijah Mosier, when was the first time 24 you reported the allegations that he had sexually 25 abused you or assaulted you?</p>

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